

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>STEPHEN McCOLLUM, <i>et al.</i>,</b>	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	<b>CIVIL ACTION NO. 3:12-CV-02037</b>
	§	
<b>BRAD LIVINGSTON, <i>et al.</i>,</b>	§	
<i>Defendants.</i>	§	

**EXPEDITED  
AGREED MOTION TO EXTEND DEADLINES**

NOW COMES Defendant the University of Texas Medical Branch, by and through its Attorney, the Attorney General for the State of Texas, and submits this Agreed Motion To Extend Deadlines. In support thereof, the Defendant respectfully offers the following:

1. The parties are working diligently to complete discovery in this case and prepare for the April 2014 trial date.
2. Because of the number of parties, witnesses and travel involved, completing discovery is taking longer than the parties anticipated.
3. The parties are working together to schedule the depositions, but some depositions are contingent upon the dates of others. As a result, the parties ask that certain deadlines be extended as outlined below.
4. Plaintiffs' deadline to designate experts and provide reports is currently November 18, 2013. The parties ask that the deadline be extended to December 20, 2013.
5. Defendants' deadline to designate experts is currently December 18. The parties ask that the deadline be extended to January 24, 2013.

6. The deadline to complete discovery, including the depositions of fact and expert witnesses is currently December 2, 2013. The parties ask that the discovery completion deadline be moved to February 24, 2014.
7. The dispositive motion deadline is currently December 16, 2013. The parties ask that the deadline be extended to January 10, 2014.
8. Defendant UTMB is currently under order to produce a 30(b)(6) witness no later than November 5, 2013. The parties have been unable to find a mutually convenient date and time. The parties ask that the deadline be extended to a mutually convenient time and date.

WHEREFORE PREMISES CONSIDERED, the parties jointly ask that the above deadlines be extended.

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

DAVID C. MATTAX  
Deputy Attorney General for Defense Litigation

KAREN D. MATLOCK  
Assistant Attorney General  
Chief, Law Enforcement Defense Division

/s/KIM COOGAN  
KIM COOGAN  
Assistant Attorney General  
Attorney-In-Charge  
State Bar No. 00783867

Law Enforcement Defense Division  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711  
(512) 463-2080/Fax (512) 495-9139

**ATTORNEYS FOR DEFENDANT  
UNIVERSITY OF TEXAS MEDICAL BRANCH**

**NOTICE OF ELECTRONIC FILING**

I, KIM COOGAN, Assistant Attorney General of Texas, certify that I have electronically submitted for filing **Expedited Agreed Motion To Extend Deadlines** to the Court, on October 28, 2013, in the Northern District of Texas, Dallas Division.

/s/ KIM COOGAN  
**KIM COOGAN**  
Assistant Attorney General

**CERTIFICATE OF CONFERENCE**

I, KIM COOGAN, conferred with all counsel on this matter and all agree.

/s/ KIM COOGAN  
**KIM COOGAN**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I, KIM COOGAN, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Expedited Agreed Motion To Extend Deadlines** has been served by placing the same in the United States Postal Service, postage prepaid, on this the 28<sup>th</sup> day of October, 2013, addressed to:

Jeff Edwards  
The Edwards Law Firm  
1101 E. 11<sup>th</sup> Street  
Austin, Texas 78702

Scott Medlock  
Texas Civil Rights Project  
1405 Montopolis Drive  
Austin, Texas 78741

Bruce R. Garcia  
Office of the Attorney General  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711

***Via Hand-Delivery***

Jonathan Stone  
Office of the Attorney General  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711

***Via Hand-Delivery***

Demetri Anastasiadis  
Office of the Attorney General  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711

***Via Hand-Delivery***

/s/KIM COOGAN

**KIM COOGAN**

Assistant Attorney General